

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

**GENESIS NETWORKS TELECOM
SERVICES, LLC,**

DEBTOR

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CASE NO. 24-50224-mmp

CHAPTER 7

**DEBTOR'S JOINDER IN RESPONSE IN OPPOSITION TO JOINT MOTION TO
TRANSFER VENUE (ECF#81) FILED BY AUSTIN TELE-SERVICES
PARTNERS, LP (ECF#90)**

TO THE HONORABLE MICHAEL M. PARKER, U.S. BANKRUPTCY JUDGE:

Genesis Networks Telecom Services, LLC, Debtor, respectfully represents:

1. The Debtor, Genesis Networks Telecom Services, LLC, joins in the Response in Opposition to Joint Motion to Transfer Venue (ECF#81) filed by Austin Tele-Services Partners, LP (ATS) (ECF #90) and incorporates the allegations and positions set forth therein.

2. In addition to the grounds for objection asserted by ATS, the debtor contends that since this case was filed on February 19, 2024 and the Motion to Transfer was not filed until October 2, 2024, the seven month delay in filing the motion indicates a waiver or circumstances under which the doctrine of laches should apply.

3. The Movant, Arris Solutions, Inv. fails to inform the Court of its action, as set forth on page 3 of the Debtor's Statement of Financial Affairs of its pending lawsuit against the Debtor in case number 2021 CI 24147, in the 166th Judicial District Court, Bexar County, Texas.

4. The Movants further fail to mention the action by creditor Wistron Neweb Corp against the debtor as set forth on page 3 of the Debtor's Statement of

Financial Affairs in case number 2024 CI 03321 pending in the 150th Judicial District Court, Bexar County, Texas.

5. The Movants also fail to disclose that the Court in the Goodman Networks, Inc. Chapter 7 case, by Order dated March 30, 2023, in case number 22-31641 mvl authorized Mr. Scott M. Seidel, the Chapter 7 Trustee, to engage Mr. John Goodman, who resides in Fredericksburg, Texas, to act as consultant for the Goodman Networks, Inc. Estate.

6. Contrary to the Trustee Rea's counsel's allegation regarding the debtor's absence of records and non-cooperation, the Debtor's counsel on Wednesday June 26, 2024 at 3:12 PM. sent Ms. Rea, Trustee through her paralegal Tani Levario the requested documents for which Ms. Rea's paralegal thanked the debtor's counsel for sending her the documents. Further, the debtor sold substantially all of its business several years ago. Its records in addition to paper records stored at its office in San Antonio remained on the file server in San Antonio sold to the buyer, to which the debtor has agreed to grant access to the Trustee. The Trustee is mistaken about the location of the debtor's books and records and their production and/or authorization to inspect to the Trustee.

7. The Movants' conclusion that there is a complete lack of connection to San Antonio, is not supported by the facts. San Antonio is and has always been where the debtor operated for years and like *Corco*, was the site of its chief operations center.

8. The Motion is not well taken and should be denied.

DATED: 21October, 2024.

Respectfully submitted,

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By: /s/ Martin Seidler
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email or First Class Mail to the parties set forth below and on those requesting notice in this case through the Court's electronic noticing system on this 21st day of October, 2024:

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